



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
NEW YORK REGIONAL OFFICE  
200 Vesey Street, Brookfield Place, Room 400  
New York, New York 10281-1022

John J. Graubard  
Senior Trial Counsel

Phone: 212-336-0084  
E-mail: graubardj@sec.gov

February 17, 2016

**VIA ECF AND HAND DELIVERY**

Honorable I. Leo Glasser  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *SEC v. Rivard*, 1:15-mc-0221-ILG (E.D.N.Y.)  
*SEC v. Rivard*, 1:04-cv-1464-ILG (E.D.N.Y.)

Dear Judge Glasser:

The parties to the above actions jointly request that your Honor grant an additional extension of time for the parties to seek an agreement on a payment plan. Your Honor allowed the parties through this Friday, February 19, 2016, by an endorsed Order on February 4, 2016 (DN 33 in 1:15-mc-0221-ILG and DN 26 in 1:04-cv-1464-ILG).

Counsel for the Commission and Mr. Rivard have exchanged proposals. Although there is substantial agreement on some points, there are others where there is no agreement. Supervisory Trial Attorney Alexander M. Vasilescu, who must be involved in this process, will not be in the Commission's offices for the rest of this week. The parties have set up a telephone conference for next Tuesday, February 23.

We therefore respectfully request a two-week extension from Friday, February 19, 2016 to Friday, March 4. We do not contemplate requesting any further extension.

Respectfully,

/s/ **John J. Graubard**  
John J. Graubard  
Senior Trial Counsel

cc: John K. Carroll, Esq.

SO ORDERED:

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